## **EXHIBIT E**

## Case 1:23-mc-00078-MKV Document 22-5 Filed 05/11/23 Page 2 of 2

## Salzman, Michael E.

F	ro	m	

Salzman, Michael E.

Sent:

Wednesday, February 22, 2023 3:22 PM

To:

Anne L. Clark

Subject:

Jim Dabney

Dear Anne,

Thanks for the list of matters you sent last Monday. As to those 12 proceedings, of course between Jim and the HHR lawyers these matters must be attended to.

Having elected to retire from the Firm and begin receiving his pension, Jim obviously cannot bill time through the Firm or appear in a proceeding under the Firm's name. If and as the relevant clients so desire, HHR lawyers working through the Firm and Jim outside the Firm can continue working as closely cooperating co-counsel on these matters as they finish up. Jim does not need access to HHR email or the FileSite document management system for that, but we will need written confirmation from the clients (which I assume will be an easy ask by Jim (Patrice Jean in the case of ) that authorizes transfer of files and that they want Jim to continue to represent them alongside (or instead of) HHR.

Please confirm that Jim will be obtaining and providing these confirmations from . For the next two weeks, pending that confirmation, we will preserve the status quo on HHR email and access to FileSite so that the transition is seamless for the clients.

As to your points about supposed breaches of the partnership agreement, whether the Firm is retaliating against Jim, or not acting in good faith, we fundamentally disagree. We have given Jim every opportunity to continue on within the Firm as Senior Counsel, and he has spurned us. The record will show that it was Jim's choice to retire in the first place, and it is we who coaxed him into continuing—if not as a partner then as Senior Counsel or Of Counsel—and continued coaxing down through last month.

Thanks

-Michael